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11 *Counsel for Defendants SIMILASAN CORPORATION  
12 and SIMILASAN AG*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 T.R.P. COMPANY, INC.,

16 Plaintiff,

17 v.

18 SIMILASAN AG AND SIMILASAN  
19 CORPORATION,

20 Defendants.

21 Case No.: 2:17-cv-02197-JCM-DJA

22 **JOINT STIPULATION AND  
23 ~~PROPOSED~~ ORDER TO EXTEND  
24 PRE-TRIAL ORDER DEADLINE**

25 **(THIRD REQUEST)**

26 Plaintiff T.R.P. Company, Inc. (“TRP”) and Defendants Similasan AG and Similasan  
27 Corporation (collectively, “Similasan”), by and through their counsel of record, hereby stipulate  
28 and agree to extend the Pre-Trial Order deadline of the Joint Discovery Plan for 4 weeks. The  
parties have engaged in substantial settlement negotiations, have reached a non-binding  
settlement in principle on most of the terms, counsel for TRP has prepared a settlement agreement  
that is under review by counsel for Similasan, and the parties anticipate finalizing and executing  
the formal, binding settlement agreement in the next couple of weeks. Although the request is  
being made fewer than 21 days from the pending deadline, the parties believe that an extension  
would be in the interests of judicial economy and efficiency. The proposed deadline to be

1 extended is:

2 1. Pre-Trial Order: September 22, 2020 to October 22, 2020.

3 Discovery is completed and there are no pending motions.

4 The Parties represent that this Stipulation is sought in good faith and for good cause. The  
5 Parties are actively involved in settlement discussions that will fully resolve the matter and a  
6 written settlement agreement has been prepared and is under review. The Parties hereby jointly  
7 respectfully request that the aforementioned Pre-Trial Order deadline be extended accordingly.

8 Dated: September 17, 2020 Respectfully submitted,

9 DICKINSON WRIGHT PLLC

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SIMILASAN AG*

21 **IT IS SO ORDERED.**

22   
23 **UNITED STATES MAGISTRATE JUDGE**

24 Dated: September 18, 2020

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 17<sup>th</sup> day of September, 2020, I served the document entitled, **JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND PRE-TRIAL ORDER DEADLINE**, on counsel of record through the CM/ECF system.

/s/    Jeff Tillison  
Employee of Brownstein Hyatt Farber  
Schreck, LLP